allowable subject matter. On the other hand, claims 1-3 and 5-9 stand rejected under 35 U.S.C. § 103 (a) as allegedly being unpatentable over Nakayama et al (4,818,236) (hereinafter "Nakayama") in view of Faulconer (3,668,301). In response, Applicant respectfully traverses the rejection of claims 1-3 and 5-9 as improper because the Examiner has failed to establish *prima facie* obviousness.

In rejecting claim 1, the Examiner relies on Nakayama to teach the claimed plurality of first wires, the plurality of second wires, and the first insulative sheet. However, the Examiner admits that Nakayama fails to disclose the claimed wiring member which holds both of the first electric wires and the second electric wires.

In order to compensate for this deficiency in the teachings of Nakayama, the Examiner turns to Faulconer and specifically points to figure 4. The Examiner relies on the terminal block 51 as the claimed wiring member, and further relies on elements 52 and 59 as the first and second wires, respectively. However, although element 59 of Faulconer corresponds to electrical leads, element 52 refers to tapered cavities for sorting and dressing a plurality of leads. (Faulconer at col. 3, lines 48-61). Indeed, the cavities of Faulconer are simply connection terminals where conductor pairs are spliced together and are in no way analogous to the claimed plurality of first electric wires, forming a first wire group. Thus, Applicant submits that the Examiner's interpretation of Faulconer is improper and cannot be relied upon for the teachings contended by the Examiner.

Even assuming *arguendo* that the plurality of electrical leads of Faulconer could somehow be construed to teach first and second electric wires, there still would be no basis for modifying Nakayama in the manner suggested by the Examiner. For instance, although Nakayama may teach a plurality of first wires and a plurality of second wires intersecting the first wires, the conductors of the vertical branch harnesses are electrically connected to the corresponding conductors of the horizontal harness so that one group of wires branches off from another group of wires. (Nakayama at Fig. 2 and col. 3, lines 18-24). Thus, the conductors, or "wires", of the first and second wire groups are "spliced" by the electrical connection. Therefore, there would be no reason to again splice these branched wires in the terminal block of Falcouner. Furthermore, Applicant submits the only motivation to combine Nakayama and Falcouner is based on impermissible hindsight reasoning supplied by the Examiner, which is clearly improper.

Accordingly, Applicant respectfully submits that the rejection of claim 1 is improper and requests it be withdrawn. Also, because claims 2-3 and 5-9 depend from claim 1, Applicant submits these claims are allowable at least by virtue of their dependency from claim 1.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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